

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA *ex rel.*,
STEPHEN A. KRAHLING and JOAN A.
WLOCHOWSKI,

Plaintiffs,

v.

MERCK & CO., INC.

Defendant.

Civil Action No. 2:10-cv-04374 (CDJ)

IN RE: MERCK MUMPS VACCINE
ANTITRUST LITIGATION

Master File No. 2:12-cv-03555 (CDJ)

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**PLAINTIFFS' MOTION REQUESTING PERMISSION TO FILE UNDER SEAL
PLAINTIFFS' REPLY IN SUPPORT OF THEIR MOTION TO STRIKE MERCK
— EXPERT WITNESSES NORMAN BAYLOR AND PETER PATRIARCA AND
OPPOSITION TO CROSS-MOTION FOR AN ORDER UNDER 18 U.S.C. § 207 (j)(6)(A)**

Relators and private antitrust plaintiffs (collectively, “Plaintiffs”) respectfully seek the Court’s permission to file under seal Plaintiffs’ Reply in Support of Their Motion to Strike Merck Expert Witnesses Norman Baylor and Peter Patriarca and Opposition to Cross-Motion for an order under 18 U.S.C. § 207 (j)(6)(A). The Protective Order governing these cases (Dkt. No. 84) protects the confidentiality of “Protected Material” so designated by the parties and permits the filing of litigation materials containing Protected Material “under seal pursuant to the Local Rules of Civil Procedure for the Eastern District of Pennsylvania until such time as the Court orders otherwise or denies permission to file under seal.” (*Id.* at ¶ 10). Plaintiffs’ combined Reply/Opposition cites to

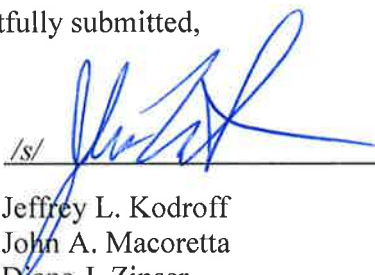
numerous materials designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order. Accordingly, Plaintiffs respectfully request permission to file the Reply/Opposition and accompanying papers under seal.

Dated: January 4, 2019

Respectfully submitted,

By:

/s/


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